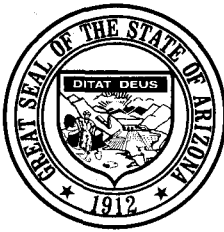


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STATE OF ARIZONA
OFFICE OF THE ATTORNEY
PUBLIC ADVOCACY DIVISION
ENVIRONMENTAL ENFORCEMENT SECTION
MEMORANDUM

06

TO: Colleen Ryan

FROM: Laurie A. Woodall (Terri Martin, Secretary) 

DATE: November 8, 2004

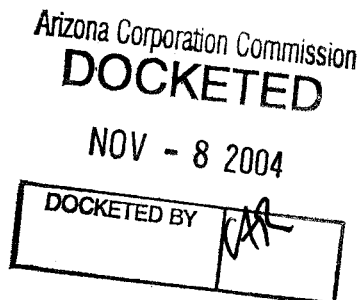
RE: Southeast Valley/ Build Out Browning, Docket No. L00000B-04-0126; Case No. 126

Enclosed is an original and 26 copies of correspondence recently received from Arizona State Parks in the above-referenced matter.

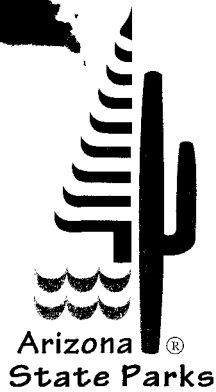
Please file and return a date-stamped copy to me via my runner.

Thank you.

Enclosures
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AZ CORP COMMISSION
DOCUMENT CONTROL



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2004 NOV -8 P 4: 11

November 2, 2004

In reply, please refer to
SHPO-2004-1973 (21790)
State Historic Preservation Act
more information requested

AZ CORP COMMISSION
DOCUMENT CONTROL
Laurie A. Woodall, Chairperson
Power Plant and Transmission Line Siting Committee
Assistant Attorney General, Environmental Enforcement Section,
Office of the Attorney General
1275 West Washington
Phoenix, Arizona 85007

Arizona Corporation Commission

DOCKETED

NOV 08 2004

DOCKETED BY

Janet Napolitano
Governor

State Parks
Board Members

Chair
John U. Hays
Yarnell

Elizabeth Stewart
Tempe

William C. Porter
Kingman

William Cordasco
Flagstaff

Gabriel Beechum
Florence

Janice Chilton
Payson

Mark Winkleman
State Land
Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

Tel & TTY: 602.542.4174
www.azstateparks.com

800.285.3703 from
(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

RE: Salt River Project's Proposed Pinal West to SEV/Browning 500 kV
Transmission Line Project, Pinal County, Arizona; Docket No. L-00000B-04-0126;
Case No. 126.

Dear Ms. Woodall:

Thank you for initiating consultation with this office regarding the above-mentioned state plan and associated certificate of environmental compatibility. We received both a literature review (i.e., Class I Inventory Report) and the certificate application. The proposed plan entails construction of overhead utility lines, four substations, and access roads as needed. A preferred alternative along with two other alignments and numerous segment options are being considered at this time. The plan involves mainly private land, although some Arizona State Land Department (ASLD) lands are present. Historian Bill Collins and I reviewed the documents submitted and offer the following comments pursuant to the State Historic Preservation Act (i.e., A.R.S. § 41-861 to 41-864) and the committee's factors to be considered (i.e., A.R.S. § 40-360.06.A.5).

The literature review was professionally prepared, well-organized and well-written. Approximately 11.8 percent of the study has been previously surveyed resulting in the identification of 222 sites, building, structures, districts or objects that are 50 years old or older. The examined data set is sufficient for purposes of scoping alternatives, although an intensive pedestrian survey of the final right-of-way will be needed to collect information on cultural resources, including those newly identified, prior to selecting treatment options (i.e., avoid, lessen or mitigate).

Based on the literature review, it is clear that cultural resources are present in the general vicinity of each proposed alignment. I wish to highlight three highly sensitive areas for cultural resources:

1) Segment Option between Nodes 32 and 174

Selection of this segment would result in indirect (i.e., visual) and direct impacts to several important archaeological sites. The segment runs parallel to and nearly adjacent Casa Grande Ruins National Monument, which contains several landmark archaeological sites including the Big House, which was prehistorically used to observe sun and moon rises and settings over the horizon. The segment also crosses several sites including the Grewe Site (AZ AA:2:2 ASM), which is a large Hohokam village site, known to contain human burials. According to the report, this areally extensive site cannot be spanned. To avoid these sites, the Preferred Alternative between Nodes 187 and 188 could be selected.

2) Eastern Alternative and a Segment Option passing through Node 175

Selection of any of these three segments would result in an indirect (i.e., visual) and direct impacts to a historic property, namely Adamsville Ruin (AZ U:15:1 ASM). This important archaeological site is listed in the National Register of Historic Places and contains an intact platform mound and ballcourt. Current research indicates that these structures, like the Big House at Casa Grande Ruins National Monument, are visually connected to important spots on the horizon. Several human burials were uncovered during the 1990s upgrade of the existing powerline that crosses a portion of this site. According to the report, this areally extensive site cannot be spanned. To avoid this site, portions of the Preferred Alternative could be selected.

3) Preferred Alignment between Nodes 31 to 203

Selection of this segment would result in direct impacts to a multicomponent site called the Grande Vista (AZ AA:2:63 ASM). Based on surface evidence, this site represents a Hohokam habitation and a historic-period homestead. According to the report, this areally extensive site cannot be spanned. To avoid this site, the Segment Options between Nodes 183, 203, and 207 could be selected.

Based on the above, this office cannot assess the plan's effects to historic properties because identification effort are incomplete, and thus cannot concur with determination of impacts at this time. Unless all historic properties can be avoided, a determination of negative impacts is likely.

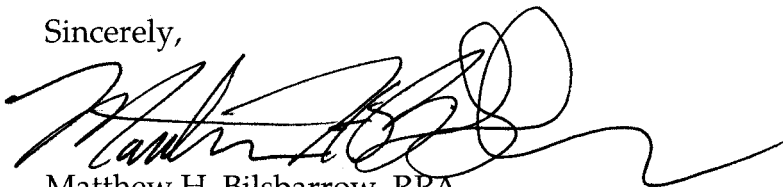
We offer the following conditions for the committee's consideration:

1) The applicant will continue to consult, on the committee's behalf, with the State Historic Preservation Office (SHPO) to identify and evaluate cultural resources present within the final right-of-way. This likely entails conducting an intensive pedestrian survey for cultural resources of the previously uninspected portions of the final right-of-way.

- 2) The applicant will continue to consult, on the committee's behalf, with SHPO to reach a determination of impact. If the result is a determination of negative impacts, the applicant will continue to consult with SHPO to resolve the negative impacts.
- 3) The applicant will avoid and/or minimize impacts to properties considered eligible for inclusion or listed in the State or National Register of Historic Places to the extent possible. Spanning over historic-period roads, canals, and railroads is an acceptable form of avoidance.
- 4) If the applicant decides that avoidance and/or minimization are not feasible, then the applicant will continue to consult, on the committee's behalf, with SHPO to plan and implement a mitigation plan. In the case of archaeological sites, a mitigation plan usually entails conducting a data recovery program that includes scientific excavations.
- 5) Should an archaeological, paleontological, or historical site or object be discovered during plan-related activities, the person in charge is required to notify promptly the Director of the Arizona State Museum and take reasonable steps to secure and maintain the resource's preservation pursuant to state law (i.e., A.R.S. § 41-844). If a discovery involves human remains or funerary objects and occurs on private land, procedures implementing A.R.S. § 41-865 must be followed.

We look forward to reviewing a cultural resource survey for the final right-of-way, so that we can make a detailed evaluation of the plan's impacts to historic properties. We appreciate the committee's cooperation with this office in considering the effects of state plans on cultural resources situated in Arizona. If you have any questions, please contact me at (602) 542-7137 or via mbilsbarrow@pr.state.az.us.

Sincerely,



Matthew H. Bilsbarrow, RPA
Planner / Archaeologist
Arizona State Historic Preservation Office

cc.

Kenneth C. Sundlof, Jr., Jennings, Strouss & Salmon; 201 E Washington St; Phoenix, AZ 85004
Richard Anduze, SRP; PO Box 52025; Phoenix, AZ 85072